

EXHIBIT C

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JOSE PANORA, *on his own behalf and on behalf of
others similarly situated,*

Case No.: 19-cv-07267(BMC)

Plaintiff,

-against-

DEENORA CORP d/b/a Dee's; DEE'S BRICK OVEN
PIZZA, INC d/b/a Dee's, and DEERAN ARABIAN a/k/a
Dee Arabian,

Defendants.
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DECLARATION OF ROBERT DENES

I, Robert Denes, declare pursuant to 28 U.S.C. § 1746 under penalty of perjury that the following is true and correct based upon my knowledge, information, and belief:

1. I am over 18 years of age and competent to testify to the matters stated in this Declaration.

2. This declaration is offered by me voluntarily and without duress. I have personal knowledge of the facts set forth herein.

3. I am a cook in the kitchen of Defendant Deenora Corp. d/b/a Dee's Brick Oven Pizza, Inc., ("Dee's").

4. During my employment with Dee's, Plaintiff Jose Panora ("Plaintiff"), who until last year was the Chef of Dee's, supervised the entire kitchen staff and was my boss.

5. From working for Dee's under Plaintiff for many years, Plaintiff and I are friends.

6. Through reading online articles about John Troy, Plaintiff's attorney in this case, I am aware that he has been sanctioned by courts, including in the recent past, for not being honest.

7. Based on Mr. Troy's poor professional reputation, I became concerned that Mr. Troy was attempting to take advantage of Plaintiff.

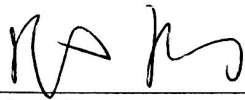
8. I became even more concerned when Plaintiff advised me that Mr. Troy had not informed him how much Defendants had offered to settle this case.

9. Out of concern, I reached out to Plaintiff on my own, because he is my friend and based on my fear that Mr. Troy was exploiting Plaintiff. Dee's senior management did not ask me to speak to Plaintiff.

10. When I spoke to Plaintiff I never demanded that Plaintiff accept any offer to settle. I did not threaten Plaintiff in any way. I also never used the term "Rule 68." I did tell Plaintiff that I was worried that Mr. Troy is not being honest with him.

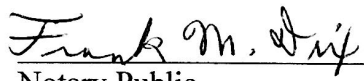
11. Mr. Troy is not being truthful to the Court. I submit this declaration to correct the record.

I declare under penalty of perjury under the laws of the State of New York and the United States of America that the foregoing is true and correct. Executed this ___ day of September, at Forest Hills, New York.



Robert Denes

Sworn to before me
this 30 day of September 2020



Notary Public

FRANK M. DIX
Notary Public, State of New York
No. 01DI4841351.
Qualified in Queens County
Commission Expires August 31, 2021